

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

JEREMY HUFFMAN, SR.,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 3:19-cv-169
)	
ST. JOSEPH COUNTY, et al)	
)	
Defendants.)	

FIRST REQUEST FOR ADMISSIONS WITH INTERROGATORIES TO PLAINTIFF

Defendants, Head Nurse Lynn, Nurse Jason, Dr. Tieman and Dr. Hall (hereinafter collectively “Defendants”), by counsel, and pursuant to Rule 36, requests that Plaintiff admit the truth of the following matters within thirty (30) days of service hereof. Rule 36 provides that these matters will be deemed to be admitted unless James Bond, Jr. indicates otherwise by written response. The matters to be admitted are:

REQUEST FOR ADMISSION NO. 1. You did not file any written grievance and/or complaint (formal or informal) against **Head Nurse Lynn, in particular**, for her alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.1: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 2. You did not file any written grievance and/or complaint (formal or informal) against **Nurse Jason in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.2: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 3. You did not file any written grievance and/or complaint (formal or informal) against **Dr. Tieman in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.3: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 4. You did not file any written grievance and/or complaint (formal or informal) against **Dr. Hall in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.4: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 5. You did not file a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Head Nurse Lynn, in particular**, for her alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.5: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 6. You did not file a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Nurse Jason in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.6: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 7. You did not file a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Dr. Tieman in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.7: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 8. You did not file a a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Dr. Hall in particular**, for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

INTERROGATORY NO. 1.8: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 9. You did not file any written grievance and/or complaint (formal or informal) against **Head Nurse Lynn, in particular**, for her alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

INTERROGATORY NO. 1.9: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 10. You did not file any written grievance and/or complaint (formal or informal) against **Nurse Jason in particular**, for his alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

INTERROGATORY NO. 1.10: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 11. You did not file a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Head Nurse Lynn, in particular**, for her alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

INTERROGATORY NO. 1.11: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 12. You did not file a second written grievance and/or complaint (formal or informal) with the Jail Commander against **Nurse Jason in particular**, for his alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

INTERROGATORY NO. 1.12: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 13. You received a copy of the Inmate Handbook at the time of your incarceration at St. Joseph County Jail.

RESPONSE:

INTERROGATORY NO. 1.13: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:

REQUEST FOR ADMISSION NO. 14. You received documentation related to St. Joseph County Jail's grievance procedure prior to October 1, 2016.

RESPONSE:

INTERROGATORY NO. 1.14: If you responded with a denial to the preceding request, please provide the facts you rely on to support that denial, or otherwise explain in detail why a denial is an appropriate response to this request.

ANSWER:



Georgianne M. Walker (23182-71)

Amanda M. Jordan (32129-71)

Attorneys for Defendants

MAY • OBERFELL • LORBER

4100 Edison Lakes Parkway, Suite 100

Mishawaka, IN 46545

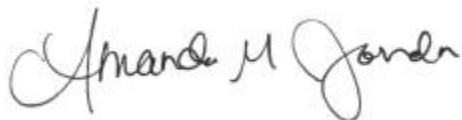
Telephone: (574) 243-4100

Facsimile: (574) 232-9789

CERTIFICATE OF SERVICE

I certify that service of the above document was made on February __, 2021 by U.S. certified mail, return receipt requested, postage affixed upon the following:

Jeremy Huffman, Sr.
16508-027
Beckley FCI
Federal Correction Institution
Inmate Mail/Parcels
P O Box 350
Beaver, WV 25813
Certified Mail #
Return Receipt Requested



Amanda Jordan (32129-71)